

RFP No.	Demand	Response
20	All documents and concerning your allegations as set forth in ¶ 21 of the Complaint that “SiteOne is the largest full product line supplies of wholesale goods for landscaping professionals in the United States and Canada.”	will produce, if any
64	All documents concerning any systems, policies, procedures, or protocols implementing different levels of employee access to your trade secrets, confidential information, and proprietary information.	will produce, if any
68	All documents concerning the economic value or competitive advantage realized by SiteOne from the secrecy or non-disclosure of the trade secrets, confidential information, and proprietary information which you contend were misappropriated by the Defendants.	will produce, if any
81	All documents concerning any computer used by any of Defendants while employed by SiteOne, including SiteOne’s ownership, use and cataloguing of any such computer.	will produce, if any
90	All documents concerning alleged damages resulting from Nick and Don’s purported access of SiteOne’s computer system or security camera systems.	will produce, if any
92	All documents concerning SiteOne’s ability to access or restrict access to the website address: http://www.lccsny.com/gdweb/SalesMobilev2.aspx .	will produce, if any
100	As to each Defendant, all documents supporting the claims that Defendants knowingly induced or participated in a breach of fiduciary duty.	will produce, if any
101	All documents supporting Plaintiff’s claim for damages for aiding and abetting breach of fiduciary duty.	will produce, if any
102	As to each Defendant, all documents and communications supporting Plaintiff’s claims that Defendants entered into an agreement in furtherance of an alleged civil conspiracy against SiteOne.	will produce, if any
103	All documents supporting Plaintiff’s claim for damages for civil conspiracy.	will produce, if any
111	All documents reflecting business plans and/or strategies concerning the acquisition by SiteOne of Garden Dept.	will produce, if any
114	All documents reflecting economic forecasts and/or projections for SiteOne Speonk, SiteOne Coram and SiteOne Dix Hills, respectively, created and/or generated prior to the acquisition by SiteOne of Garden Dept.	will produce, if any
115	All documents reflecting economic forecasts and/or projections for the SiteOne Speonk, SiteOne Coram and SiteOne Dix Hills, respectively, created and/or generated subsequent to the acquisition by SiteOne of Garden Dept.	will produce, if any
116	All documents concerning SiteOne’s investigation concerning the claims for relief asserted in this action relative to each of the Defendants.	will produce, if any
117	All documents containing or referencing non-privileged communications that in any way relate to the facts alleged in any of the pleadings filed in this action.	will produce, if any